

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO

As representative of:

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

Debtors

PROMESA (TITLE III)

Case No. 17-BK-3283 (LTS)

(Jointly Administered)¹

**BDO OF PUERTO RICO PSC (NOW KNOWN AS OLD OF PUERTO RICO, PSC) URGENT MOTION
TO EXTEND DEADLINE TO FILE A RESPONSE TO THE FIVE HUNDRED SEVENTIETH OMNIBUS
OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND PUERTO RICO
PUBLIC BUILDINGS AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE**

COMES NOW, BDO OF PUERTO RICO PSC (now known as Old of Puerto Rico, PSC) (hereinafter “Creditor”), by and through the undersigned legal counsel, and after meeting and conferring with Debtors’ counsel respectfully submits this urgent uncontested motion (the “Urgent Motion”) to extend the deadline to file a response to the Five Hundred Seventieth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico, The Employees Retirement System Of The Government Of The Commonwealth Of Puerto Rico, The Puerto Rico Highways And Transportation Authority, and

1. On June 10, 2022, BDO filed Proof of Claim No. 180070 (See Claims Register No. 180070).
2. On April 20, 2023, the Debtors filed the Five Hundred Seventieth Omnibus Objection.
3. BDO submits this Urgent motion to request an extension of the Response Deadline to

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474).

permit BDO to file an adequate response to the Five Hundred Seventieth Omnibus Objection.

4. BDO respectfully requests, on an urgent basis, that the Court grant it a 10-day extension to file its response, which extension shall commence from the Response Deadline of May 22, 2023, and would be due on June 1, 2023.

5. Pursuant to Paragraph I.H of the Sixteenth Amended Notice, Case Management and Administrative Procedures Order (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the "CMP Order"), BDO hereby certifies that it has (a) carefully examined the matter and concluded that:

- a. there is a true need for an urgent decision;
- b. not created the urgency through any lack of due diligence; and
- c. reasonable, good-faith communications took place with the parties to this adversary proceeding to resolve or narrow the issues before the Court.

6. In addition, Creditor certifies that no prior request for the relief sought herein has been made.

WHEREFORE, ITS hereby requests, on an urgent basis, that the Court (i) enter an order substantially in the form attached hereto as **Exhibit A** granting it a 30-day extension, until June 1, 2023, to file its response to Five Hundred Seventieth Omnibus Objection; and (ii) enter any other relief that is just or appropriate given the circumstances.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of May 2023.

CERTIFICATE OF SERVICE:

In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's CMP Order, we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

s/JUAN R. RIVERA FONT
JUAN R. RIVERA FONT
USDC-PR No. 221703
JUAN R RIVERA FONT, LLC
27 González Giusti Ave., Office 602
Guaynabo, PR 00968
juan@riverafont.com
Tel.: (787) 250-8040